

EXHIBIT “G”

<p style="text-align: right;">Page 97</p> <p>1 MR. KELLY: Absolutely ask him that question.</p> <p>2 MR. KIM: And I could ask him in different</p> <p>3 ways. You cannot object to it just because you</p> <p>4 don't like the testimony.</p> <p>5 MR. KELLY: I absolutely can. It's my</p> <p>6 obligation to object to it when I think it's</p> <p>7 unfair.</p> <p>8 MR. KIM: You are coaching the witness.</p> <p>9 Basically you are coaching the witness. You cannot</p> <p>10 do that. He just changed his testimony.</p> <p>11 MR. KELLY: Actually I'm --</p> <p>12 MR. KIM: He just said [REDACTED] is unique to the</p> <p>13 plaintiff and then I asked him again and he said</p> <p>14 it's not unique to the plaintiff.</p> <p>15 MR. KELLY: Then examine him on what you think</p> <p>16 is an inconsistency.</p> <p>17 MR. KIM: That's what I'm trying to do.</p> <p>18 As soon as I started to do that you objected.</p> <p>19 MR. KELLY: Of course I objected. It's my</p> <p>20 obligation to object.</p> <p>21 MR. KIM: Right now you're contradicting</p> <p>22 yourself. You're saying I'm allowed to do that but</p> <p>23 you're saying I could interrupt.</p> <p>24 MR. KELLY: I'm not going to tell you what</p> <p>25 questions to ask or how to ask questions. That's</p>	<p style="text-align: right;">Page 99</p> <p>1 Q Okay. So you said it's an internal reference</p> <p>2 number. To what, to a system, to your collection</p> <p>3 software?</p> <p>4 A It's used in our office when someone with a</p> <p>5 user ID and password is logged into our system and they</p> <p>6 type in the [REDACTED] they're going to get -- and this is</p> <p>7 why I say it might not be unique -- they could get</p> <p>8 multiple names that come up on the screen and they then</p> <p>9 have to select the correct associated person who they're</p> <p>10 either looking for or who they're referencing.</p> <p>11 Q So the system is a website or your internal</p> <p>12 collection software?</p> <p>13 A When I talk about the system I'm talking at</p> <p>14 this point about our collection software system.</p> <p>15 Q Platinum or FACS or both?</p> <p>16 A Both.</p> <p>17 Q When Platinum was active it was with Platinum?</p> <p>18 A Correct.</p> <p>19 Q And after it was migrated it's with FACS?</p> <p>20 A It is with FACS, yes.</p> <p>21 Q So a person could go on the website and type</p> <p>22 in [REDACTED] and there would be multiple people associated</p> <p>23 with [REDACTED]?</p> <p>24 A No, a person couldn't go on a website and type</p> <p>25 in [REDACTED] and get a particular person.</p>
<p style="text-align: right;">Page 98</p> <p>1 not my job. My job is to object when I think the</p> <p>2 form of your questions are improper.</p> <p>3 That's what I'm doing.</p> <p>4 MR. KIM: Can we go off the record?</p> <p>5 (Thereupon, a discussion was held off the</p> <p>6 record, after which the following proceedings</p> <p>7 were held:)</p> <p>8 MR. KIM: Can you read back the last question?</p> <p>9 (Thereupon, the previous question was read</p> <p>10 back by the court reporter.)</p> <p>11 A [REDACTED] is what I thought I was answering was</p> <p>12 what are the elements of data that are included on the</p> <p>13 notice and somehow that turned into elements that are</p> <p>14 unique to the plaintiff and the [REDACTED] may not be unique</p> <p>15 and I think that that was my point.</p> <p>16 BY MR. KIM:</p> <p>17 Q So what is [REDACTED]?</p> <p>18 A It's an internal reference number.</p> <p>19 Q So is it an internal reference number that's</p> <p>20 unique to the plaintiff?</p> <p>21 A As I said, I don't think that it's necessarily</p> <p>22 unique to the plaintiff.</p> <p>23 Q So --</p> <p>24 A There could be [REDACTED] that is used to</p> <p>25 reference someone else.</p>	<p style="text-align: right;">Page 100</p> <p>1 Q So a person could not go into a website and</p> <p>2 type in the [REDACTED]?</p> <p>3 A A person can go on any website they want and</p> <p>4 type that in.</p> <p>5 Q So can you explain your previous testimony</p> <p>6 that the court reporter --</p> <p>7 A I'm not talking about a website. I'm talking</p> <p>8 about a particular software system, a collection</p> <p>9 software system that we use in our office.</p> <p>10 Q So your employees would type --</p> <p>11 A They would have to be someone who has the</p> <p>12 credentials to bring up an account within our software</p> <p>13 system. So the credentials would be they'd have to have</p> <p>14 a user ID and they would have to have a password and it</p> <p>15 would have to be a valid user ID and password.</p> <p>16 Q So is that in a closed Internet system?</p> <p>17 MR. KELLY: Objection to form.</p> <p>18 A Internet or intranet?</p> <p>19 BY MR. KIM:</p> <p>20 Q Intranet in a closed system inaccessible by</p> <p>21 outside people.</p> <p>22 MR. KELLY: Objection, form.</p> <p>23 A I don't call it a closed intranet system but</p> <p>24 I'm not sure if that's the right term or not.</p> <p>25 BY MR. KIM:</p>

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1 internal reference number to inquire about the account?
2 A Any person outside of HRRG, can they call into
3 HRRG and provide the --
4 Q Internal reference number.
5 A This [REDACTED] number?
6 Is that what you're asking about?
7 Q Yeah, or any other -- well, we're calling
8 [REDACTED] the internal reference number, right?
9 A Yes. Yes, anyone can pickup a phone and call
10 HRRG and refer to that number.
11 Q And that would identify the collection account
12 in question?
13 A No.
14 Q What would it do?
15 A It wouldn't do anything unless a
16 representative with the appropriate credentials were
17 logged into our collection software system and keyed in
18 those -- that internal reference number and at that
19 point they would ask the person who's calling, who they
20 are and they would have them provide their
21 identification information at which point they'd be
22 asked for their date of birth or the last four digits of
23 their Social Security number.
24 If they were able to provide that additional
25 information, the representative could then access the

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1 system, bring up the matching account information and
2 they would use either that date of birth in association
3 with this internal reference number or their last four
4 of Social to appropriately identify the person.
5 Q So besides the date of birth or the Social,
6 last four digits of the Social Security number, what
7 other identifying information would a collector need in
8 conjunction with the internal reference number?
9 A I don't think they'd need another piece. I
10 think they could bring it up with that or they could use
11 a different combination of information.
12 Q What are all the combinations that could be
13 used with the internal reference number?
14 A Together with the internal reference number
15 they would have to have either a date of birth or the
16 last four of Social to bring up a specific consumer's
17 account information.
18 Q So nothing else.
19 A Nothing else.
20 Q Does HRRG have a written policy to that
21 effect?
22 A Yes.
23 Q Was it in effect in 2014?
24 A Yes.
25 Q Is it the same policy to the present?

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1 A The [REDACTED] format has been changed on the [REDACTED]
2 system so other than to the extent that's been changed
3 in how it's formatted, yes, the same policy is in effect
4 as was in effect then.
5 Q Can you produce those policies, please?
6 So the internal reference number system was
7 changed once HRRG switched over to the [REDACTED] system?
8 A No. What I said was the format had changed
9 when we went on the [REDACTED] system.
10 Q How did it change?
11 A It no longer has the letters together with the
12 numbers. There was a [REDACTED] account number that was all
13 numeric.
14 Q Did it convert the old system into the new
15 numerical system or was the old reference number system
16 retained?
17 A The old information -- it's both actually --
18 the old information is retained. It was loaded into a
19 user-defined window within the [REDACTED] software system and
20 [REDACTED] account number was assigned in addition to that.
21 Q Now can a person utilize the internal
22 reference number to access information on HRRG's
23 website?
24 A No.
25 Q HRRG maintains a website?

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1 A Yes.
2 Q Is it HRRG collections dot-com?
3 A Yes.
4 Q Is it the same website that was active in
5 2014?
6 A Yes, I believe so.
7 Q So a person cannot go into HRRG collections
8 dot-com and enter the [REDACTED] reference number?
9 A They can. They won't bring up an account.
10 Q What would it bring up?
11 A It will bring up some type of an error
12 message. I mean they need other information together
13 with that to get on the website and bring up account
14 information.
15 Q What other information does it need or does
16 one need?
17 A A person would need to have a [REDACTED] account
18 number and the correct associated Pin number.
19 Q In 2014 what information would a person need
20 to access the information on HRRG collections dot-com?
21 A They would need that internal reference
22 number, the Pin number and one other piece of personally
23 identifying information like their date of birth or
24 their Social, their full Social Security number.
25 Q And the [REDACTED] number was an addition in 2015

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<p style="text-align: right;">Page 129</p> <p>1 Why was a decision made to include the 2 internal reference number in the barcode above the 3 recipient's mailing address, name and mailing address? 4 MR. KELLY: Just to be clear are you referring 5 to Exhibit 4 now when you were pointing? 6 MR. KIM: Yes. 7 MR. KELLY: Could you read back the question? 8 (Thereupon, the previous question was read 9 back by the court reporter.) 10 MR. KELLY: Objection to form. 11 A The barcode was to be used for processing mail 12 that came back that was either returned by the post -- 13 mail that was returned by the post office as 14 undeliverable and it was to be used as a way of 15 verifying the address information. 16 So we used the internal reference number as 17 part of that code so that we could associate it with a 18 particular address. 19 BY MR. KIM: 20 Q So have you ever scanned the barcode that's 21 above the recipient's name and address? 22 MR. KELLY: Objection. 23 A Are we talking about the barcode on this 24 letter or are we talking about in general or -- 25 BY MR. KIM:</p>	<p style="text-align: right;">Page 131</p> <p>1 Q Is that to preserve I guess manpower? 2 What's the significance of not opening the 3 envelope? 4 A To save time. 5 Q So once the return mail is received does 6 someone scan it, the barcode, without opening it? 7 MR. KELLY: Objection to form. 8 A Yeah, the timeframe that you're asking about 9 because the process has changed. 10 BY MR. KIM: 11 Q Let's start with the proposed class period 12 which is December 2nd, 2014 through December 2nd, 2015. 13 A Okay, and now I'm sorry, repeat the question. 14 Q I'll start from the beginning chronologically 15 When did HRRG decide to make the barcode 16 containing the internal reference number visible through 17 the window envelopes? 18 MR. KELLY: Objection to form. I'm sorry. 19 Can you read that back, please? 20 (Thereupon, the previous question was read 21 back by the court reporter.) 22 MR. KELLY: Same objection. 23 A I cannot -- I can't tell you the date or even 24 approximate it. It was sometime ago. 25 BY MR. KIM:</p>
<p style="text-align: right;">Page 130</p> <p>1 Q Let's start with this December 3rd letter. 2 A Okay, and you're asking if I personally have 3 ever scanned it? 4 Q Uh-huh. 5 A Or are you asking -- 6 Q Yes. 7 A Yes, I've scanned this barcode. 8 Q And what comes up when you scanned the 9 barcode? 10 MR. KELLY: Objection to form. 11 A Yeah, with the correct barcode scanner what 12 comes up is the [REDACTED] number that we can internal 13 reference together with the first ten character 14 positions of the first line of street address. 15 BY MR. KIM: 16 Q So [REDACTED] plus -- 17 A A space and then [REDACTED] I think it ends with 18 S to get ten including the spaces. 19 Q So why was a decision made to make that 20 barcode visible when mailing these letters? 21 MR. KELLY: Objection to form. 22 A The decision was to make it visible through 23 the window in order to be able to process return mail 24 without opening the envelopes. 25 BY MR. KIM:</p>	<p style="text-align: right;">Page 132</p> <p>1 Q Before 2014? 2 A Yes, yeah. 3 Q When did it stop including the barcode? 4 A When did what stop? 5 Q When did HRRG stop revealing the barcode 6 containing the internal reference number through the 7 window envelope? 8 MR. KELLY: Objection to form. 9 A I don't know. 10 BY MR. KIM: 11 Q Has it stopped now? 12 A The internal reference number, the use of the 13 internal reference number for return mail processing is 14 something that we have begun to outsource. It's now 15 being handled by our letter vendor. 16 Q When did that begin? 17 A Sometime after this filing of this lawsuit. 18 Q So now Nordis tracks the return mail? 19 A Yes, and they do it with a different coding 20 system. 21 Q So after this lawsuit was filed HRRG has 22 stopped processing return mail. 23 A Not completely but stopped. We've outsourced 24 the processing of our return mail. 25 Q When you say not completely --</p>

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1 that against the desired information that we were
2 checking which is the first line of street address
3 together with that internal reference number.
4 Q This was 2014?
5 A Early on. No, this was before 2014.
6 Q Okay
7 A And then we moved on to a system where we were
8 using the scanning gun. We would get a tray of return
9 mail from our post office that we would go to the post
10 office to pick up our mail and they would have the trays
11 of return mail there. We would get in a tray and a
12 clerk would have the scanning gun set up on a PC.
13 Q It's connected to the PC?
14 A As an input device for that PC and take the
15 letters that came back in the mail, put a slack of the
16 window envelopes down on the desk and run them under the
17 scanning gun. The data was going into a file on that
18 PC. That file was then used as input into our
19 collection software system.
20 We had a custom program written that would --
21 when it had a match between that reference number
22 together with those first ten character positions with
23 the data that was in our system, it would set what we
24 call a mail return flag and that would stop mail from
25 going out for that person whose account was flagged as

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1 having had return mail.
2 If there was a non-match it would not set the
3 mail return flag and the premise was that the address
4 information that was in our system that was different
5 was probably newer information and as a result we had
6 already updated the information.
7 So we may have had a phone call from a person
8 who called in and said, you know, my address has changed
9 and our representative could have updated the address in
10 our system.
11 Q Or online the consumer could have submitted a
12 new address online.
13 A Potentially
14 Q And this was all done without opening the
15 envelope.
16 A Right.
17 Q And when did this procedure continue?
18 A It continued up until the point where we --
19 when we went to [REDACTED] that internal reference number the
20 format changed but the process still remained the same
21 and until we outsourced that function.
22 Q After this lawsuit.
23 A Right.
24 Q So that procedure was in effect in 2014 and
25 most of 2015?

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1 A Yes.
2 Q What other clients did you have in New Jersey
3 in 2014 and 2015?
4 A I don't have a list of the clients in New
5 Jersey so I can't answer you. I don't know.
6 Q From December 2nd, 2014 to December 2nd, 2015,
7 let's just call that the proposed class period, in the
8 proposed class period approximately how many letters
9 were sent out to New Jersey consumers?
10 A I don't know.
11 Q Would it be over 50?
12 A Yes.
13 Q Would it be over 500?
14 A Ask the initial question again, please.
15 Q So during the proposed class period to how
16 many New Jersey consumers were collection letters sent
17 out by HRRG?
18 MR KFI I Y: Objection to form.
19 A Yes, it would be over -- you were at 500?
20 Q Right.
21 A Yeah.
22 Q During the proposed class period approximately
23 how many mail was returned?
24 A I couldn't even guess at that.
25 Q Would it be, you know, on average per month

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1 over 500 pieces of mail?
2 A I don't know.
3 Q How many employees do you have or did HRRG
4 have to process the return mail?
5 A I would say somewhere between one and three.
6 Q Approximately how many letters were sent each
7 month by HRRG to New Jersey consumers?
8 A I don't know.
9 Q Approximately how many percentage of the mail
10 were returned?
11 A I don't know that either
12 Q Is that information that you could look up on
13 the collection software?
14 A No.
15 Q Well, again prior to the outsourcing to Nordis
16 the process was that when a letter is sent it's marked
17 in the collection software, right?
18 A A flag would get set within the collection
19 software system.
20 Q And once the mail's returned someone, an
21 employee scans it, if the internal reference number and
22 first ten characters of the address matches the system
23 then it would also flag return mail, correct?
24 A Right.
25 Q So would you be able to determine how many



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1 Is that what you're saying?

2 A Yeah, it may not though. I'm not sure.

3 Q Now going back to B I just want to again so

4 the record's clear, the barcode that we've been

5 discussing extensively is the first thing from the top.

6 Is that what that is?

7 A Yes.

8 Q Then we go down and we see three lines of an

9 address, correct?

10 A Yes.

11 Q And then below that is another barcode. I'll

12 call it a barcode. Is that the postal code?

13 A Yes.

14 Q And that's relevant somehow to the post

15 office?

16 A Yes.

17 Q And that's everything that would have been in

18 that window; is that right?

19 A Correct.

20 Q Now the process that you described of scanning

21 the mail that's returned, you're talking about mail that

22 came back from the post office because the post office

23 couldn't deliver it to the address in that window; is

24 that right?

25 A Yes.

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1 Q All right. And if I understand what you were

2 describing with the barcode, okay, that if it was

3 scanned by your internal system it would generate a

4 piece of data; is that right?

5 A Yes.

6 Q And that data -- and I was using your word

7 that I wrote down -- would be a series of characters, I

8 think you said 16 characters; is that right?

9 A Yes, that's right.

10 Q And so I'll call that -- so if you scanned it

11 it would generate its own code that was 16 characters,

12 right?

13 A Yes.

14 Q And that code that it generated would be made

15 up of different pieces of information; is that right?

16 A Yes.

17 Q So when before the questions were asked

18 repeatedly about whether the [REDACTED] code is quote

19 unquote in that barcode, okay?

20 A Yes.

21 Q What's in that barcode is actually a 16 digit

22 number, not a six digit number, correct?

23 A Sixteen characters.

24 Q Sixteen?

25 A Sixteen character code

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1 Q So in this particular case if your internal

2 system scanned this return mail, if it came back, which

3 we know it didn't but if it did, what 16 digit code

4 would have been generated?

5 A Sixteen characters.

6 Q Sixteen characters.

7 A It would have been [REDACTED], a space, and then

8 15 space [REDACTED]

9 Q So the purpose of that piece of data was I

10 understand your testimony to enable the computer to

11 essentially read the address that came back on the

12 returned letter; is that right?

13 A Yes.

14 Q So it's really a code so that a computer can

15 read the other information in the window which is the

16 person's address; is that right?

17 A Yes.

18 Q And then it took that address that came back

19 and compared it with the address that you currently had

20 in your system to see if they matched.

21 A Yes.

22 Q So really the only thing in that barcode is an

23 address.

24 A Yes.

25 Q Okay. Am I correct that no where in that

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1 barcode is an account number?

2 A Yes.

3 Q Am I correct that no where in that barcode is

4 any private information related to Mr. Morales?

5 A Yes.

6 Q Am I even correct that the barcode doesn't

7 even contain any portion of an account number, correct?

8 A Yes.

9 Q Am I correct that that barcode does not

10 contain any information that identifies the person who

11 received the letter as a debtor?

12 A Yes.

13 Q Am I also correct that the account number is

14 not visible anywhere on this envelope, correct?

15 A Yes.

16 Q The account number is actually on what part of

17 the letter?

18 A On the payment voucher part of the letter

19 Q And is that the only place it appears?

20 A Yes.

21 Q It's never visible to any person looking at

22 the envelope, correct?

23 A Correct.

24 Q All right. When you were asked by counsel to

25 look at Exhibit 3 -- ma'am court reporter, would you

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1 mind, Exhibit 3, please -- go to page five of nine
2 please, specifically paragraph 38.
3 Are you with me?
4 A Yes.
5 Q You may remember that counsel asked you to
6 look at this paragraph. I want to direct your attention
7 back to that.
8 I can represent to you that this is the
9 definition proposed by plaintiff of the class and the
10 definition and I'll read this in the record. Let me
11 know if I'm reading it correctly, okay?
12 All consumers residing in the state of New
13 Jersey, to whom defendant, that's HRRG, sent a
14 collection letter, which letter was dated within a year
15 prior to December 2nd, 2015, semi-colon (b) was seeking
16 to collect a consumer debt and (c) was sent in a
17 windowed envelope such that the barcode containing the
18 account number associated with the debt was visible from
19 the outside of the envelope, unquote.
20 Did I read that correctly?
21 A Yes.
22 Q Has HRRG, in fact, ever sent out an envelope
23 that had a window that, quote, contained the account
24 number associated with the debt?
25 A No.

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1 Q The scanning system that was set up by HRRG
2 for the return mail that we talked about that checked
3 the addresses, is the data code that's generated by that
4 scanner during the time that it's scanned during the
5 time that it's converted to this code entered into a
6 computer? I think you said it was put into a computer
7 data file, right?
8 A Yes, data file.
9 Q And then that data file is then sort of
10 examined by a computer and compared to another data
11 file, right?
12 A Yeah, by a custom program.
13 Q Custom program?
14 A That we had written.
15 Q So during that entire process that we just
16 described is any human actually even looking at the
17 code?
18 A No.
19 Q It's all an internal computer process that
20 we're talking about, right?
21 A Yes.
22 Q Am I also correct that if somebody called with
23 a data code that your system generated by this barcode
24 that code itself, that 16 digit code doesn't correspond
25 to any internal account code that you maintain, does it?

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1 A No.
2 Q In fact, if we looked at Exhibit I think it's
3 Number 6, and counsel went through in detail all the
4 different codes that are on Mr. Morales' account
5 screenshot here, right?
6 A Right.
7 Q That 16 digit code doesn't even appear on
8 here, correct?
9 A Correct.
10 MR. KIM: That's the [REDACTED] right?
11 Is that the old one or the new one?
12 MR. KELLY: This is the one you marked.
13 MR. KIM: Right, but is that a screenshot of
14 the new software?
15 MR. KELLY: I have no idea.
16 BY MR. KELLY:
17 Q So that number doesn't appear on this account
18 screen, correct?
19 A Correct.
20 Q And nor would that number -- strike that.
21 Counsel asked you a lot of questions about the
22 website and how people would access your website to pay
23 bills, right?
24 A Yes.
25 Q The code that is generated internally by HRRG

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1 when scanning this barcode, that can't even be put on
2 your website, can it?
3 A No.
4 Q And nobody could call with that code and get
5 any information, could they?
6 A No.
7 Q So that code had one purpose and that's
8 internally to be compared by a computer with another
9 piece of data to see if it has the correct address, is
10 that right?
11 A To see if it matches, yes.
12 Q See if it matches the address you have on
13 file.
14 A Well, the portion of the address that's in
15 that code.
16 Q Right, and that's the only purpose of that
17 code.
18 A Yes.
19 MR. KIM: I just want to clarify. By code are
20 you saying [REDACTED] space [REDACTED] is that what
21 you're saying, or are you just saying [REDACTED]
22 MR. KELLY: I've never used that. When I say
23 code I was clear I'm talking about the code that
24 would be generated by the company scanning the
25 barcode which is a 16 digit barcode.

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1 MR. KIM: So the entire scan which would be
2 [REDACTED]
3 MR. KELLY: First of all, you're not objecting
4 to the form now. You're testifying.
5 MR. KIM: I'm just confused because I don't
6 know if he's saying the [REDACTED] doesn't result or
7 the entire scan doesn't as it's fully in that
8 format, the scanned format, that itself doesn't
9 identify anything.
10 I'm not sure what he's really testifying.
11 MR. KELLY: You've been a little inconsistent
12 in how you respond to my questions because you're
13 supposed to object to the form, not do any speaking
14 but that's okay. I'm okay with it.
15 BY MR. KELLY:
16 Q But the data code that is generated by your
17 internal system that would scan this barcode whether it
18 be for Mr. Morales or anybody else, that code cannot be
19 input anywhere on the HRRG website, correct?
20 A Correct.
21 Q In fact, that code cannot be used to obtain
22 any information about a debtor's account, correct?
23 A Correct.
24 MR. KELLY: I think that's all I have.
25 In fact, I know it is. Thank you.

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1 MR. KIM: I just want to follow-up. I just
2 want to clarify, if I may.
3 REDIRECT EXAMINATION
4 BY MR. KIM:
5 Q [REDACTED] can be used when calling HRRG or on
6 HRRG's website or its payment portal when a person is
7 calling or, you know, entering information with respect
8 to that account, correct?
9 MR. KELLY: Objection to form.
10 A When you say can be used --
11 BY MR. KIM:
12 Q So a person could call HRRG prior to HRRG's
13 using the new [REDACTED] system so when HRRG was using the
14 Platinum software a consumer could call and provide his
15 [REDACTED] internal reference number to identify the
16 account.
17 MR. KELLY: Objection to form.
18 A No, they could call and they could give --
19 when you say use that --
20 BY MR. KIM:
21 Q Provide.
22 A -- reference number they could provide that
23 information to a representative on the phone but the
24 representative would not necessarily bring up an account
25 from that alone

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1 In fact, our policies and procedures
2 prohibited them from doing that based on that number
3 alone.
4 Q So is it the policies and procedure that
5 prohibits an HRRG representative from doing that or is
6 it impossible to do that?
7 MR. KELLY: Objection to form
8 A Well, you know, we have a lot of discussion
9 about that being used to pull up an individual account
10 and I already answered those questions that that is not
11 going to uniquely identify a person's account.
12 BY MR. KIM:
13 Q Right, but it would -- [REDACTED] would pull up
14 Alejandro Morales and possibly 25 other people.
15 A Among others, yes.
16 Q And --
17 A For our rep internal.
18 Q Right, and someone could also input [REDACTED] in
19 the HRRG's website to either change their address or
20 submit a payment perhaps?
21 MR. KELLY: Objection.
22 A No, not strictly the [REDACTED]. They would have
23 to put in the UMB and all the other required fields.
24 BY MR. KIM:
25 Q Name and address, right?

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1 A Would have to be completed and then they could
2 submit that information on our website at which point it
3 would be received by a clerical support person.
4 Q And that clerical support person would update
5 the address and the e-mail address of the debtor?
6 A They follow policies and procedures that are
7 designed to tell them what they will do with that
8 information and I'm not prepared to testify about what
9 they will do with that information.
10 Let's say, for instance, that they enter [REDACTED]
11 and they have a different name, okay, other than
12 Alejandro Morales, you know, they are not updating that
13 information when that information is not meeting -- not
14 matching and they would have to not update that
15 information at that point.
16 Q So if someone enters Alejandro Morales,
17 [REDACTED], a new address and an e-mail?
18 A All the required fields, I don't know if it's
19 just a new address and an e-mail, I don't know but I
20 think there were some other required fields on that
21 screen.
22 Q So --
23 A First name, last name, account number, your
24 street address, your city, your zip code, your state and
25 your e-mail. So unless they can enter all that